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Attorney for Defendant
CHARLES GONZALES

United States District Court
Northern District of California

UNITED STATES OF AMERICA,)	CR No. 4:14-cr-00099-PJH-1
)	
Plaintiff,)	STIPULATION AND <u>[PROPOSED]</u> ORDER
)	CONTINUING CHANGE OF PLEA HEARING
v.)	AS TO DEFENDANT GONZALES
)	
CHARLES GONZALES,)	
)	
Defendant.)	
)	

Defendant CHARLES GONZALES, by and through his counsel undersigned, and the United States of America, through MICHAEL A. RABKIN, Trial Attorney, United States Department of Justice, Antitrust Division, hereby stipulate and respectfully request that the Court vacate the Change of Plea hearing in the above captioned case, currently set for Thursday, January 26, 2017, at 09:30 a.m., and reset it for Thursday, February 02, 2017, at 09:30 a.m.

This is the parties' second request to continue the Change of Plea hearing as to Defendant Gonzales. The parties last appeared before the Court on September 21, 2016 for status.

Discovery from the government is complete, and on Tuesday, November 22, 2016, a revised plea offer was extended to the Defendant.

1 The requested continuance is requested due to the unavailability
2 of defense counsel due to illness with the flu. Attorney Robert J.
3 Beles has been the primary attorney for Charles Gonzales and is the
4 only attorney familiar with this matter.

5 For the above-stated reasons, the defendant, defense counsel,
6 and the government stipulate and respectfully request that the Court
7 vacate the Change of Plea hearing currently set for Thursday, January
8 26, 2017 and reset it for Thursday, February 02, 2017, at 9:30 a.m.

9 **IT IS SO STIPULATED.**

10
11 Respectfully submitted,

12 DATED: January 24, 2017

13 /s/ RJB
14 ROBERT J. BELES,
Attorney for CHARLES GONZALES

15 DATED: January 24, 2017

16 /s/ MAR
17 MICHAEL A. RABKIN,
18 Trial Attorney
United States Dept. of Justice
Antitrust Division

19
20 **IT IS SO ORDERED.**

21
22 DATED: 1/25/17

23
24
25 Kandis Westmore
26 HON. KANDIS A. WESTMORE
UNITED STATES MAGISTRATE JUDGE